

1 Q. In your experience in a company that small,
2 when the company was experiencing severe cash shortages,
3 would it be a complete surprise to Mr. Clancy that they
4 were short on cash?

5 MS. WELLS: Objection to the form of the
6 question. How does he know what Mr. Clancy was
7 thinking?

8 BY MR. O'CONNOR:

9 Q. You can answer.

10 A. Alls I can say is, everybody knew the company
11 was tight on cash, because everybody in that building was
12 aware on a daily basis that we were making choices of who
13 to pay, who not to pay. So I can't answer your question
14 directly, but I can say everybody in that building knew
15 that.

16 (Deposition Exhibit 18 was marked for
17 identification.)

18 THE WITNESS: Thank you.

19 BY MR. O'CONNOR:

20 Q. Have you ever seen the exhibit that's in front
21 of you before?

22 A. Yes, I did. I have.

23 MS. WELLS: Can you give me the date please?

24 MR. O'CONNOR: Sure. January 8th.

25 THE WITNESS: 2010.